

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

(DRAFT)

Conditional Major, Operating

Permit: F-08-010

Dana Sealing Manufacturing, LLC

Danville, KY 40422

March 19, 2008

Mark Labhart, Reviewer

SOURCE ID: 21-021-00049

AGENCY INTEREST: 384

ACTIVITY: APE20080001

SOURCE DESCRIPTION:

Dana Sealing Manufacturing located at 500 Techwood Lane in Danville (Boyle County), manufactures automotive steel gaskets. The Multi-Layer Steel (MLS) gasket production consists of gasket presses which produce the steel portion of the gaskets plus three coating lines, each line having a series of coating applicators and drying ovens. The coatings used contain little or no HAP. Potential emissions of single and combined HAP are below major source thresholds; however the potential emissions of VOC are greater than a major source threshold. The source was issued a Title V permit June 27, 2003. As a major source, Dana was subject to 401 KAR 59:225. Compliance with this regulation was achieved with a valveless regenerative thermal oxidizer (VRTO). At this time the source is requesting limitations on VOC emissions. As a minor source Dana will not be required to operate the VRTO or otherwise control VOC emissions; however the conditional major limitation on VOC is lower than the Title V PTE. Therefore the issuance of this permit is not a relaxation of prior conditions.

COMMENTS:

- Potential to Emit is based on 100% emission of VOC from all solvent containing materials.
- 401 KAR 59:225, *New Miscellaneous Metal Parts and Products Surface Coating Operations*, is not applicable as this is a minor source located in a county designated attainment for ozone.
- There are currently no National Emission Standards for Hazardous Air Pollutants (NESHAPs) regulations that apply to the source.
- The uncontrolled potential to emit has not changed since the last Title V revision. Under Title V, the source was subject to 401 KAR 59:225 which requires an 85% overall control of VOC emissions. The applicability of 59:225 limited the PTE (controlled) below the threshold for Title I. Without the control requirement of 59:225 the uncontrolled potential becomes the source PTE.

EMISSION AND OPERATING CAPS DESCRIPTION:

Dana has requested a voluntary emission limitation on VOC of 40 tpy.

OPERATIONAL FLEXIBILITY:

Dana is not restricted on hours of operation or quantity of product produced as long as they remain within the source wide VOC emission limitation above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.